

THE HONORABLE JOHN H. CHUN

**UNITED STATES DISTRICT COURT
WESTERN DISTRICT OF WASHINGTON
AT SEATTLE**

FEDERAL TRADE COMMISSION, *et al.*,

Plaintiffs,

v.

AMAZON.COM, INC., a corporation,

Defendant.

CASE NO.: 2:23-cv-01495-JHC

**STIPULATED MOTION AND
[PROPOSED] ORDER TO SEAL
PORTIONS OF THE AMENDED
COMPLAINT**

**NOTE ON MOTION CALENDAR:
Thursday, March 14, 2024**

The parties, by and through their attorneys of record, respectfully request that the Court enter the proposed order set forth below, sealing portions of Plaintiffs' Amended Complaint.

In support of this request, the parties represent the following to the Court:

1. On February 13, 2024, the Court issued a Case Scheduling Order setting March 14, 2024 as the deadline to join additional parties. Dkt. #159.
2. Pursuant to that Order, Plaintiffs are filing an Amended Complaint that joins as plaintiffs the Commonwealth of Puerto Rico and the State of Vermont. The only changes in the Amended Complaint relate to this joinder.

3. The Court previously entered two orders sealing portions of the Complaint. Dkts. #108, 120.

4. The Amended Complaint includes information the Court previously ordered to be sealed. *Id.* That information is highlighted in the Amended Complaint.

5. Plaintiffs are filing a public version of the Amended Complaint redacting only the information the Court previously ordered to be sealed. *Id.*

6. Pursuant to Local Civil Rule 5(g)(3)(A), the undersigned counsel certify that they met and conferred to reach the agreement described in this Stipulated Motion.

The following attorneys conferred by telephone on March 14, 2024: Edward H. Takashima and Kara King for the FTC and Constance T. Forkner for Amazon.

7. The parties stipulate as follows, subject to Court approval, and jointly request that the Court enter the following Order approving this Stipulation:

a. The highlighted portions of the Amended Complaint shall be sealed.

Stipulated to and respectfully submitted this 14th day of March, 2024, by:

s/ Edward H. Takashima

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Attorneys for Defendant Amazon.com, Inc.

[PROPOSED] ORDER

IT IS SO ORDERED.

DATED this _____ day of _____, 2024.

JOHN H. CHUN
UNITED STATES DISTRICT JUDGE

Presented By:

s/ Edward H. Takashima

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